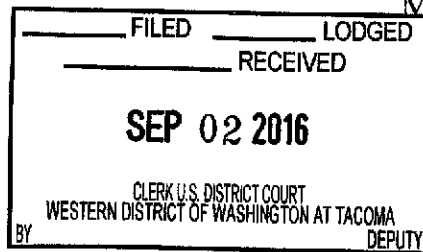


Magistrate Judge David W. Christel



UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

HECTOR J. FLORES SALAS,

Defendant.

NO. MJ16-5161

COMPLAINT for VIOLATION

18 U.S.C. § 2251(a)

BEFORE, the Honorable David W. Christel, United States Magistrate Judge, U. S.
Courthouse, Tacoma, Washington.

The undersigned complainant being duly sworn states:

COUNT 1
(Production of Child Pornography)

In or about July 2016, within the Western District of Washington, and elsewhere,
the defendant, HECTOR J. FLORES SALAS, did attempt to, and did knowingly employ,
use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct
for the purpose of producing visual depictions of such conduct and transmitting live
visual depictions of such conduct, knowing or having reason to know that such visual
depictions would be transported and transmitted using any means or facility of interstate
and foreign commerce and such visual depictions were transported and transmitted using

1 any means or facility of interstate and foreign commerce and in and affecting interstate
2 and foreign commerce and such visual depictions were produced using materials that had
3 been mailed, shipped, and transported in interstate and foreign commerce.

4 All in violation of Title 18, United States Code, Section 2251(a) and (e).

5 And the Complainant states that this Complaint is based on the following
6 information:

7 I, Jack F. Kane, being first duly sworn on oath, depose and say:

8 **I. INTRODUCTION**

9 1. I am a Special Agent (SA) with the Federal Bureau of Investigation
10 assigned to the Bellingham, Washington Resident Agency, Seattle, Washington field
11 office. I am an investigative and law enforcement officer of the United States within the
12 meaning of Title 18, United States Code, Section 2510(7). My duties as a Special Agent
13 include the full time investigation of a wide range of federal criminal offenses, including
14 investigations involving child exploitation and child pornography, including violations
15 pertaining to the illegal production, distribution, receipt, and possession of child
16 pornography and material involving the sexual exploitation of minors in violation of 18
17 U.S.C. §§ 2251, 2252(a), and 2252A(a). I have participated in the execution of previous
18 search and arrest warrants which involved child exploitation and/or child pornography
19 offenses and the search and seizure of computers and other digital devices.

20 2. As detailed below, based on my investigation and the investigation of other
21 law enforcement officers, I submit there is probable cause to believe that HECTOR
22 FLORES SALAS has committed the violation described above. In particular, the
23 investigation has uncovered substantial evidence that FLORES SALAS sexually
24 exploited a [REDACTED] girl and knowingly produced visual depictions of that
25 victim engaged in sexually explicit conduct.

26 3. The facts set forth in this Complaint are based on my own personal
27 knowledge; knowledge obtained from other individuals during my participation in this
28 investigation, including other law enforcement officers; interviews of cooperating

1 witnesses; review of documents and records related to this investigation; communications
2 with others who have personal knowledge of the events and circumstances described
3 herein; and information gained through my training and experience.

4 4. Because this Complaint is submitted for the limited purpose of establishing
5 probable cause, it does not set forth each and every fact that I or others have learned
6 during the course of this investigation. I have set forth only the facts that I believe are
7 relevant to the determination of probable cause to believe that HECTOR FLORES
8 SALAS committed the offense charged in this Complaint.

9 II. SUMMARY OF PROBABLE CAUSE

10 5. Following an investigation into the sexual exploitation of a minor victim,
11 MV1, on August 31, 2016, I obtained a search warrant from the United States District
12 Court for the Western District of Washington at Seattle for residences in Enumclaw and
13 Spanaway, Washington, the person of HECTOR FLORES SALAS, and a silver 2003
14 Jeep Liberty.

15 6. On September 1, 2016, FBI Special Agents executed these warrants.
16 FLORES SALAS was present at the Spanaway residence when the warrants were
17 executed. Agents seized a number of items from the Spanaway residence, including, but
18 not limited to: two cellular telephones, a tablet, a blue necktie, and blue shoes with
19 orange stripes.

20 7. I advised FLORES SALAS that it was requested that he come with the
21 Agents to the Pierce County Sheriff's Office Substation in Tacoma, Washington.
22 FLORES SALAS agreed to come to the Sheriff's Office Substation and rode in a vehicle
23 with Pierce County Sheriff's Deputies.

24 8. On September 1, 2016, FBI Agents Sara Blond, Jack Kane, and Greg
25 Witkop interviewed FLORES SALAS at the Pierce County Sheriff's Office Substation in
26 Tacoma, Washington. FLORES SALAS was advised of *Miranda* rights. He waived
27 those rights and agreed to speak with law enforcement. That interview was recorded.
28

1 9. During the course of the interview, agents presented FLORES SALAS with
2 a group of images that portrayed MV1 engaged in sexual acts with an unknown
3 individual. These materials were recovered from the phone of JAMES MILLS, JR., in
4 [REDACTED] pursuant to a search warrant issued in the United States
5 District Court for the Western District of Washington at Seattle on July 27, 2016.
6 Previous forensic analysis of these materials indicated that these materials had been
7 received by MILLS via KIK¹ messenger.

8 10. After FLORES SALAS was presented with these images, FLORES
9 SALAS advised that he was the individual that was performing sexual acts with MV1 in
10 these images. He further indicated that he had taken pictures and videos while engaging
11 in these sexual acts with MV1 using his Samsung Galaxy 3 cellular phone. FLORES
12 SALAS indicated that MV1 represented to him that she was [REDACTED]

13 11. FLORES SALAS also confirmed that he, MV1, and an individual who
14 FLORES SALAS knew only by a KIK username containing the phrase [REDACTED] had
15 engaged in text communications via KIK earlier that day. During these text
16 conversations, it was agreed, among other things, that FLORES SALAS would pick-up
17 MV1 and give her a ride so that she could meet up with [REDACTED] Investigation in
18 this case indicates that [REDACTED] is the KIK username of MILLS.

19 12. In a previous statement to law enforcement on July 28, 2016, MILLS
20 indicated that he, MV1, and another KIK user – determined by investigation to be
21 FLORES SALAS – engaged in a group chat using KIK messenger in which the three
22 discussed sex acts that MV1 would perform with FLORES SALAS in exchange for
23 transportation to [REDACTED] MILLS also stated that he directed MV1 to have sex with
24 FLORES SALAS, and further directed FLORES SALAS to take videos of these sexual
25 acts and send them to MILLS via KIK messenger. Investigation indicates that when this
26
27

28 ¹ KIK is known to me as a text messaging and social media application for mobile devices. This application has both text and video chat capabilities.

1 | text conversation occurred, wherein MILLS directed the production of child
2 | pornography, MILLS was in King County and MV1 was in [REDACTED] Washington.

3 | 13. On September 1, 2016, an FBI CART Examiner conducted an examination
4 | of FLORES SALAS' Samsung Galaxy 3 – seized from FLORES SALAS' person on the
5 | morning of September 1, 2016. The examination revealed images of MV1 engaged in
6 | sex acts with an adult male. I have reviewed the images recovered from FLORES
7 | SALAS' phone and describe three of these images below:

8 | 20160718_014232.jpg, [REDACTED]
9 | [REDACTED]
10 | [REDACTED]

11 | 20160718_014736.jpg, [REDACTED]
12 | [REDACTED]
13 | [REDACTED]

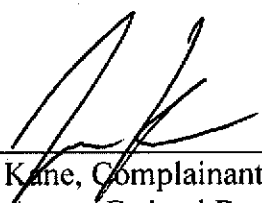
14 | cac9a294-bbdb-4a68-8433-716a056c9fbd.jpg, [REDACTED]
15 | [REDACTED]
16 | [REDACTED]

17 | 14. I have reviewed the sets of images referenced in paragraphs 9 and 13
18 | above, and they are depictions of the same event. Furthermore, in both sets of images,
19 | the blue necktie and the blue and orange-striped shoes seized from FLORES SALAS'
20 | residence are clearly visible. Finally, given evidence gathered at the Spanaway residence
21 | on September 1, 2016, to include Agent observations of items in FLORES SALAS'
22 | bedroom, it is clear that the child pornography was produced at FLORES SALAS'
23 | Spanaway residence.

24 | 15. Based on my knowledge, training and experience, and the knowledge,
25 | training and experience of other law enforcement officers that I have consulted with I
26 | know that the device on which the sexually explicit depictions were produced – a
27 | Samsung Galaxy 3 – is not entirely produced with components manufactured in
28 |

1 Washington State. Furthermore, I know that final assembly of this device does not occur
2 in Washington State.

3 16. Based on the above facts, I respectfully submit that there is probable cause
4 to believe that HECTOR FLORES SALAS did knowingly produce child pornography in
5 violation of Title 18, United States Code, Section 2251(a).

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9 
10 Jack F. Kane, Complainant
Special Agent, Federal Bureau of Investigation

11 Based on the Complaint and Affidavit sworn to before me, and subscribed in my
12 presence, the Court hereby finds that there is probable cause to believe the Defendant
13 committed the offense(s) set forth in the Complaint.
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15 Dated this 20th day of September, 2016.

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18 DAVID W. CHRISTEL
19 United States Magistrate Judge
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